



## **Notification Requirements for Large Quantity Handlers of Universal Waste**

### **Technical Guidance Document HW 01-01**

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This document provides guidance on notification requirements for handlers of universal waste. The more general requirements for notification of hazardous waste activities are contained in *K.A.R. 28-31-4(c)*, *EPA Identification Numbers*, and are not the subject of this technical guidance document. Certain widely generated hazardous wastes have been designated as universal waste. This designation allows universal waste handlers to manage universal waste under the streamlined requirements of *40 CFR 273* instead of the more stringent RCRA Subtitle C requirements for hazardous waste. Universal waste includes hazardous waste batteries, certain hazardous waste pesticides, mercury-containing thermostats, and hazardous waste lamps. As the title of this document indicates, only **Large Quantity Handlers** of universal waste are required to notify the department and obtain an EPA Identification Number.

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#### **Handlers of Universal Waste**

There are several categories of universal waste handlers. A generator of universal waste is a universal waste handler. The owner or operator of a facility that receives universal waste from other handlers and accumulates the universal waste before sending it to another universal waste handler or to a destination facility or to a foreign destination is also a universal waste handler.

The universal waste regulations identify, according to the quantity of universal waste accumulated, two classes of universal waste handlers, small quantity and large quantity.

A Small Quantity Handler of universal waste (*40 CFR 273, Subpart B*) is a handler that accumulates less than 5,000 kilograms (11,000 pounds) of universal waste at any time.

A Large Quantity Handler of universal waste (*40 CFR 273, Subpart C*) is a handler who generates

or accumulates 5,000 kilograms or more of universal waste.

#### **Requirements for Small Quantity Handlers**

Small quantity universal waste handlers must manage universal waste in an environmentally responsible manner as described in *40 CFR 273, Subpart B*, but are not required to notify the Kansas Department of Health and Environment concerning universal waste activities.

#### **Requirements for Large Quantity Handlers**

##### *Management of Universal Waste*

A Large Quantity Handler of universal waste is:

- 1) Prohibited from disposing of universal waste; and
- 2) Prohibited from diluting or treating universal waste unless the handler is managing specific wastes (*40 CFR 273.33*) or there is an emergency situation.

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### *Notification Requirements*

A handler of universal waste must submit written notification of universal waste management to the Kansas Department of Health and Environment's Bureau of Waste Management (BWM) before meeting or exceeding the 5,000 kilogram storage limit.

There are two exceptions to this requirement:

1) If the large quantity handler of universal waste has already notified BWM concerning hazardous waste management activities and has received an EPA Identification Number there is no requirement to renotify for universal waste.

2) A large quantity handler of universal waste who manages recalled universal waste pesticide as described in *40 CFR 273.3(a)(1)* and who has sent notification to BWM as required by *40 CFR 165* is not required to notify for those recalled pesticides.

The notification forms can be obtained by writing to the address contained in the heading of this document or by calling the telephone number listed below.

For additional information regarding proper management of solid waste, universal waste, or hazardous waste, you may contact the Bureau of Waste Management at (785)296-1600 or the address at the top of this document or visit the BWM web page at [www.kdhe.state.ks.us/waste](http://www.kdhe.state.ks.us/waste).